

1 BRETT A. AXELROD, ESQ.
2 Nevada Bar No. 5859
3 NICHOLAS A. KOFFROTH, ESQ.
4 Nevada Bar No. 16264
5 ZACHARY T. WILLIAMS, ESQ.
6 Nevada Bar No. 16023
7 **FOX ROTHSCHILD LLP**
8 1980 Festival Plaza Drive, Suite 700
9 Las Vegas, Nevada 89135
10 Telephone: (702) 262-6899
11 Facsimile: (702) 597-5503
12 Email: baxelrod@foxrothschild.com
13 nkoffroth@foxrothschild.com
14 zwilliams@foxrothschild.com
15 *Counsel for Debtor*

16 **UNITED STATES BANKRUPTCY COURT**

17 **DISTRICT OF NEVADA**

18 In re

19 CASH CLOUD, INC.,
20 dba COIN CLOUD,

21 Debtor.

22 Case No. BK-23-10423-mkn

23 Chapter 11

24 **SECOND STIPULATION TO
25 EXTEND DEADLINES**

26 Cash Cloud, Inc. dba Coin Cloud (the “Debtor”), debtor and debtor in possession in the above-
27 captioned case (the “Chapter 11 Case”), by and through its counsel Fox Rothschild LLP and Brink’s
28 Incorporated (“Brink’s” and together with the Debtor, the “Parties”), by and through its counsel
Hirschler Fleischer, P.C., stipulate and agree as follows (the “Stipulation”):

29 **RECITALS**

30 A. WHEREAS, on February 7, 2023, Debtor filed a voluntary petition under chapter 11
31 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court
32 for the District of Nevada (the “Court”), commencing the Chapter 11 Case;

33 FOX ROTHSCHILD LLP
34 1980 Festival Plaza Drive, Suite 700
35 Las Vegas, Nevada 89135
36 (702) 262-6899
37 (702) 597-5503 (fax)

1 B. WHEREAS, on May 28, 2023, the Debtor filed its *Chapter 11 Plan of Reorganization*
 2 *dated May 8, 2023* [ECF No. 528] (the “Plan”) and its *Disclosure Statement for Chapter 11 Plan of*
 3 *Reorganization dated May 8, 2023* [ECF No. 529] (the “Disclosure Statement”);

4 C. WHEREAS, on June 14, 2023, the Court entered the *Order Approving Stipulation to*
 5 *Extend Deadlines* [ECF No. 661] between Brink’s and the Debtor, which extended, *inter alia*, the
 6 deadlines by which Brink’s must vote on and object to the Plan to June 22, 2023 at 5:00 p.m. (the
 7 “Ballot and Objection Deadline”), and extended the deadline by which the Debtor may reply to any
 8 Brink’s objection to June 27, 2023 at 5:00 p.m. (the “Reply Deadline”);

9 D. WHEREAS, on June 20, 2023, the Debtor, CKDL Credit, LLC, Genesis Global
 10 Holdco, LLC, Enigma Securities Limited, and the Official Committee of Unsecured Creditors filed
 11 the *Stipulation to Continue Hearing on (I) Final Approval of the Disclosure Statement; and (II)*
 12 *Confirmation of the Debtor’s Chapter 11 Plan of Reorganization Dated May 8, 2023* [ECF No. 732]
 13 (the “Plan Hearing Continuance”), which, *inter alia*, continued the hearing on the Plan and Disclosure
 14 Statement to July 27, 2023 at 1:30 p.m., extended the deadline to file objections to the Plan and
 15 Disclosure Statement to July 13, 2023 at 5:00 p.m., and extended the deadline by which the Debtor
 16 may file a reply to objections to July 20, 2023 at 5:00 p.m.; and

17 E. WHEREAS, in light of the Plan Hearing Continuance and consistent therewith, the
 18 Parties desire to extend the Ballot and Objection Deadline for Brink’s to July 13, 2023 at 5:00 p.m.;

19 NOW, THEREFORE, the Parties hereby stipulate and agree to the following:

20 IT IS STIPULATED AND AGREED that:

21 1. The Ballot and Objection Deadline shall be moved to July 13, 2023 at 5:00 p.m.
 22 (Pacific Time) for Brink’s;

23

24

25

26

27

28

1 2. The Reply Deadline for any Brink's objection shall be moved to July 20, 2023 at 5:00
2 p.m. (Pacific Time).

3 Dated this 20th day of June 2023.

4 **FOX ROTHSCHILD LLP**

5 By: /s/Brett A. Axelrod
6 BRETT A. AXELROD, ESQ.
7 Nevada Bar No. 5859
8 NICHOLAS A. KOFFROTH, ESQ.
9 Nevada Bar No. 16264
10 ZACHARY T. WILLIAMS, ESQ.
11 Nevada Bar No. 16023
12 1980 Festival Plaza Drive, Suite 700
13 Las Vegas, Nevada 89135
14 *Counsel for Debtor*

5 **HIRSCHLER FLEISCHER, P.C.**

6 By: /s/Brittany B. Falabella
7 ROBERT S. WESTERMAN, ESQ.
8 (pro hac vice forthcoming)
9 BRITTANY B. FALABELLA, ESQ.
10 (pro hac vice forthcoming)
11 2100 East Cary Street
12 Richmond, Virginia 23223

13 and

14 MAURICE B. VERSTANDIG, ESQ.
15 Nevada Bar No. 15346
16 The VerStandig Law Firm, LLC
17 1452 W. Horizon Ridge Pkwy, #665
18 Henderson, Nevada 89012
19 *Counsel for the Brink's, Inc.*

20 1980 Festival Plaza Drive, Suite 700
21 Las Vegas, Nevada 89135
22 (702) 262-5699
23 (702) 597-5503 (fax)